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USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: 9/2/2020

September 2, 2020

BY EMAIL & ECF

The Honorable Analisa Torres
 United States District Court Judge
 Southern District of New York
 500 Pearl Street
 New York, New York 10007

Re: United States v. William Bazemore; 19 Cr. 6 (AT)

Dear Judge Torres:

I represent William Bazemore in the above-referenced matter, having been appointed pursuant to the provisions of the Criminal Justice Act (“CJA”), 18 U.S.C. § 3006A on August 13, 2020 to represent him at a hearing to further investigate what his former attorneys communicated to him about the terms of his plea agreement. On August 26, 2020, the Court scheduled the hearing for September 3, 2020. I write to request a three-week adjournment of tomorrow’s hearing as Mr. Bazemore has not had sufficient time to communicate with counsel.

Mr. Bazemore is incarcerated at MDC Brooklyn. As the Court is aware, attorney visits are presently suspended. As such, the only means of communication with clients is via legal calls that are scheduled through the efforts of paralegals at Federal Defenders, who are working diligently to facilitate communications between clients and their lawyers and members of defense teams.

Shortly after my appointment, I submitted a request for a legal call with Mr. Bazemore. I was informed it was scheduled for August 20, 2020, between 9am-12pm. MDC did not call me during that time. The call was then rescheduled for August 26, 2020. This was the earliest date for the rescheduled call. I spoke with Mr. Bazemore on that date, later spoke with Ms. Meredith Heller, Mr. Bazemore’s current counsel, and submitted a request for another legal call. That call occurred this morning.

Mr. Bazemore is contemplating his options, including whether to proceed with the hearing. Additional time is necessary for him to speak with Ms. Heller and myself so that he can decide how he wishes to proceed. Accordingly, we respectfully request a three-week adjournment.

Thank you for your consideration.

Respectfully submitted,

/s/

Anthony Cecutti

GRANTED. The hearing scheduled for September 3, 2020, is ADJOURNED *sine die*.

SO ORDERED.

Dated: September 2, 2020

New York, New York



ANALISA TORRES
United States District Judge